

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

**FILED**

**OCT - 3 2017**

CLERK'S OFFICE  
U.S. DISTRICT COURT  
EASTERN MICHIGAN

Neal Cohen; Darren Chaffee; SSL  
Assets, LLC,

Plaintiffs,

v.

Jaffe, Raitt, Heuer & Weiss, P.C;  
Jeffrey M. Weiss; Lee B. Kellert;  
and Deborah L. Baughman,

Defendants.

Case No.: 2:16-cv-11484-GCS-APP

**JURY VERDICT FORM**

**QUESTION NO. 1:** Were any of the defendants professionally negligent as claimed by the plaintiffs?

ANSWER: yes (Yes or No)

If your answer is "yes," go to question 2. If your answer is "no," do not answer any further questions.

**NEAL COHEN AND DARREN CHAFFEE**

**QUESTION NO. 2:** Was the defendants' professional negligence a proximate cause of the damage to Neal Cohen ("Cohen") and Darren Chaffee ("Chaffee")?

ANSWER: yes (Yes or No)

If your answer is "yes," continue to question 3. If your answer is "no," go to question 9.

**QUESTION NO. 3:** What is the total amount of damages for Cohen and Chaffee?

ANSWER: Neal Cohen: \$ 3,181,000

Darren Chaffee: \$ 3,181,000

Continue to question 4.

**QUESTION NO. 4:** Did Cohen and Chaffee use reasonable care and diligence to minimize their damages?

**ANSWER:** NO (Yes or No)

If your answer is "yes," go to question 6. If your answer is "no," continue to question 5.

**QUESTION NO. 5:** What amount of the damages set forth in question 3 do you believe Cohen or Chaffee should have minimized through reasonable care and diligence?

**ANSWER:** Neal Cohen: \$ 2,148,000

Darren Chaffee: \$ 2,514,000

Continue to question 6.

**QUESTION NO. 6:** Were Cohen or Chaffee negligent as claimed by the defendants?

**ANSWER:** NO (Yes or No)

If your answer is "yes," continue to question 7. If your answer is "no," go to question 9.

**QUESTION NO. 7:** Was Cohen's or Chaffee's negligence a proximate cause of any of the damage they claim?

**ANSWER:** \_\_\_\_\_ (Yes or No)

If your answer is "yes," continue to question 8. If your answer is "no," go to question 9.

**QUESTION NO. 8:** For the amount of damages you believe Cohen and Chaffee are entitled to recover, and using 100% as the total, what percentage of fault do you attribute to the defendants, and what percentage do you attribute to Cohen and Chaffee?

**ANSWER:** \_\_\_\_\_% to Defendants

\_\_\_\_\_% to Neal Cohen and Darren Chaffee

Continue to question 9.

**SSL ASSETS, LLC**

**QUESTION NO. 9:** Did the defendants have an attorney-client relationship with SSL Assets, LLC ("SSL")?

**ANSWER:** yes (Yes or No)

If your answer is "yes," go to question 10. If your answer is "no," do not answer any further questions.

**QUESTION NO. 10:** Was the defendants' professional negligence a proximate cause of the damage to SSL?

**ANSWER:** yes (Yes or No)

If your answer is "yes," go to question 11. If your answer is "no," do not answer any further questions.

**QUESTION NO. 11:** What is the total amount of damages for SSL?

**ANSWER:** \$ 3,259,960

Continue to question 12.

**QUESTION NO. 12:** Did SSL use reasonable care and diligence to minimize its damages?

**ANSWER:** yes (Yes or No)

If your answer is "yes," go to question 14. If your answer is "no," go to question 13.

**QUESTION NO. 13:** What amount of the damages set forth in question 11 do you believe SSL should have minimized through reasonable care and diligence?

**ANSWER:** \$ \_\_\_\_\_

Go to question 14.

**QUESTION NO. 14:** Was SSL negligent as claimed by the defendants?

**ANSWER:** NO (Yes or No)

If your answer is "yes," continue to question 15. If your answer is "no," do not answer any further questions.

**QUESTION NO. 15:** Was SSL's negligence a proximate cause of any of the damage it claims?

**ANSWER:** \_\_\_\_\_ (Yes or No)

If your answer is "yes," continue to question 16. If your answer is "no," do not answer any further instructions.

**QUESTION NO. 16:** For the amount of damages you believe SSL is entitled to recover, and using 100% as the total, what percentage of fault do you attribute to the defendants, and what percentage do you attribute to SSL?

**ANSWER:** \_\_\_\_\_ % to Defendants

\_\_\_\_\_ % to SSL

**s/Jury Foreperson**

In compliance with the Privacy Policy adopted by the Judicial Conference, the verdict form with the original signature has been filed under seal.

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